

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

|   |   |                      |
|---|---|----------------------|
| In the Matters of                                     | ) |                      |
|   | ) |                      |
| IP-Enabled Services                                   | ) | WC Docket No. 04-36  |
|   | ) |                      |
| E911 Requirements for IP-Enabled<br>Service Providers | ) | WC Docket No. 05-196 |

**COMPLIANCE LETTER  
PRT LARGA DISTANCIA, INC.**

On November 7, 2005 the Commission's Enforcement Bureau issued a Public Notice setting forth the specific information that interconnected voice over Internet Protocol (VoIP) service providers must include in the Compliance Letters required by the Commission in its June 3, 2005 Order (*the VoIP 911 Order*), establishing enhanced 911 requirements for IP-enabled service providers. As ordered by the Commission, the Compliance Letter must be filed on or before November 28, 2005.

As PRT Larga Distancia, Inc. (PRTL D) has informed to the Commission on prior reports<sup>1</sup>, it provides an interconnected VoIP service called PhoneMax on the Island of Puerto Rico. PhoneMax customers who travel to the U.S. may also use their PhoneMax service. However, PRTL D sells and markets its PhoneMax service exclusively to customers in Puerto Rico.

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<sup>1</sup> Subscriber Notification and Acknowledgements Reports dated August 10, 2005; September 1, 2005; September 22, 2005 and October 25, 2005.

PRTLTD has taken all necessary steps to comply with the requirements of the *VoIP 911 Order* with respect to all of its customers in Puerto Rico. The details specified in the Enforcement Bureau's Public Notice released November 7, 2005 are specified below.

**1. 911 Solution:** This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*.

PRTLTD provides 911 services in compliance with the *VoIP 911 Order* to 100% of its PhoneMax customers. PRTLTD markets its PhoneMax service only within Puerto Rico.

**1(a) Routing Information/Connectivity to Wireline E911 Network:** A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized. If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.

PRTLTD's VoIP switch is directly connected to PRT's 911 Selective Router via dedicated PRI circuits. This selective router is connected to the Puerto Rico PSAP (there is only one PSAP in Puerto Rico and it handles all 911 calls in Puerto Rico) with

dedicated facilities. When a 911 call is generated by a PhoneMax customer located in Puerto Rico, the VoIP switch routes this call to the 911 selective router with the ANI information, which in turn connects the call to the PSAP and forwards the ANI information. The Puerto Rico PSAP uses the ANI information to query the ALI database to get the location information of the customer generating the call.

**1.b Transmission of ANI and Registered Location Information:** A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are not capable of receiving and processing information, a detailed explanation of why not.

As stated before, Puerto Rico has only one PSAP for 911 call handling. PRTL D transmits, via the Wireline E911 Network, the 911 caller's ANI to the Puerto Rico PSAP for 100% of its PhoneMax customers. The Puerto Rico PSAP is the owner of the ALI database, therefore PRTL D only needs to send the ANI information

to the PSAP on a 911 call and the PSAP uses it to query the ALI database for the customer's location.

**1.c 911 Coverage:** To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

PRTL D provides its PhoneMax service within the island of Puerto Rico in full compliance with the requirements of the *VoIP 911 Order*.

**2. Obtaining Initial Registered Location Information:** A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.

PRTL D provides the Puerto Rico PSAP with the registered address of customers as part of the initial service order process. Since PhoneMax service requires a broadband access line (DSL service), the registered address for the customer is the location where the DSL line is registered with the company. As part of the service order process, our systems generate a NENA compliant database update file, which is sent to the Puerto Rico PSAP to update their ALI database via a dedicated data link with the PSAP. This file includes the VoIP phone number, address information and VoIP indicator. PRTL D has the initial registered location for 100% of its customers.

**3. Obtaining Updated Registered Location Information:** A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.

In order to update the customer's registered location, PRTLTD has prepared a WEB interface that allows customers to enter their new location, validates this address against the company's addresses database, and sends the new validated address information to the PR PSAP to update the ALI database in a NENA compliant database update file via the dedicated data link to the PSAP. The WEB interface also allows nomadic customers traveling to the US to provide the address where they are located, which is validated by Intrado.<sup>2</sup> Intrado validates US addresses using a MSAG database, geocodes this address and defines the 911 PSAP that handles 911 calls for the specific area, and the PSAP capabilities for 911 call handling.

The new address information being registered with the WEB interface is stored in a separate database from the initial address location information collected in the initial service order process. The customer will access the WEB through the following electronic address: [www.dmaxpr.com](http://www.dmaxpr.com). (Exhibit I) are copies of the WEB interface pages available to PhoneMax customers.

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<sup>2</sup> PRTLTD has executed a contract with Intrado for the handling of 911 calls generated by its PhoneMax customers who travel to the U.S.

If the customer does not have access to the WEB, he/she may call the Help Desk (1-866-375-3375) and have one of the technicians access the WEB interface for them.

**4. Technical Solution for Nomadic Subscribers:** A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service.

- A. Puerto Rico – Nomadic customers traveling inside Puerto Rico will be required to update their location information whenever they move from one location to another, through the methods explained under item number 3 (above). When the customer dials 911, the call will be directed to the PSAP with ANI information, and the PSAP will query the ALI for the customer location. Since the Location Update process updates the PSAP ALI database directly, it will contain the latest information provided by the customer.
- B. U.S. – As stated before, for nomadic customers traveling to the U.S., PRTLTD has entered into a contractual relationship with Intrado. Address information for these customers will be updated through the methods explained under item number 3 (above) and PRTLTD VoIP switch has dedicated PRI trunk connections with Intrado. Once a customer has a valid US address with Intrado, the interface modifies the location information parameter in the VoIP switch to reflect a US location. If a customer dials 911, the VoIP switch will verify the customer location and if the registered

address is in the US, the switch will send the call via the dedicated PRI trunks to Intrado with ANI information. Intrado will take the ANI of the call, verify the PSAP capabilities associated with the registered location and depending on the capabilities, route the call to the required selective router or facilities interconnecting the appropriate PSAP. Intrado will also assign a pseudo ANI to the call and, if the PSAP has the capability, forward the information to the PSAP. If the PSAP is capable of receiving the ANI, the PSAP will query Intrado with the pseudo ANI and receive the location information of the caller and the callback number.

Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. According to information submitted by Intrado, it has currently deployed approximately 567 PSAPs with the V9-1-1 Mobility Service and expects to bring that number (pending successful testing) to approximately 950 PSAPs around the country by the end of the day today. Those areas within the U.S. in which PSAPs are not served by a Selective Router are not included within the FCC Order and are not required for compliance. However, Intrado is actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery.

## **5. Automatic Detection Mechanism**

In the November 7, 2005, Public Notice, the Enforcement Bureau stated that AT&T, MCI and Verizon had submitted letters regarding 911 compliance plans which convey an automatic detection mechanism that enables the provider to identify when a customer may have moved his or her interconnected VoIP service to a new location and ensure that the customer continues to receive 911 service even when using the interconnected VoIP service nomadically. The plans also include a commitment to not accept new interconnected VoIP customers in areas where the provider cannot provide 911 service and to adopt a “grandfather” process for existing customers for whom the provider has not yet implemented either full 911 service or the automatic detection capability.

With respect to the aforementioned “automatic detection 911 compliance plans”, the Enforcement Bureau ordered interconnected VoIP providers to include in their November 28, 2005 Compliance Letters a detailed statement as to whether and how they have implemented such measures.

PRTLTD informs the Commission that it is in the process of developing an “automatic detection 911 compliance plan” for nomadic customers traveling within Puerto Rico or to the US. The PhoneMax service will automatically detect when a customer may have moved from his or her previous location and will restrict the service until the customer accesses the



WEB interface and updates his or her location information. Once the location information has been updated, the system will restore the PhoneMax service. While in a restricted mode, the customer will be only allowed to receive incoming calls, dial 911 and access the Help Desk via the 800 number. Whenever a customer tries to use the PhoneMax service, calls will be redirected to a recorded which will inform the customer why the service has been restricted and how to update the location information.

Respectfully submitted, this 28<sup>th</sup> day of November, 2005.

PRT Larga Distancia, Inc.  
Roberto García Rodríguez, Esq.  
Walter Arroyo Carrasquillo, Esq.  
PO Box 360998  
San Juan, PR 00936-0998  
Tel. (787) 782-9046

By: (signed)

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María del C. García  
PR Bar No. 11,223

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Address <http://www.dmaxpr.com/911.htm>

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HOME SOBRE DMAX **PRODUCTOS** PLANES Y PRECIOS SUSCRIBETE AYUDA DMAX EXTREMO

> ¿Qué es PhoneMAX?  
> Beneficios  
> Planes  
> **PhoneMAX y el 911**

De ahora en adelante,  
tu manera de  
hacer llamadas será  
totalmente distinta.

**¿Qué es PhoneMAX?**

PhoneMAX es una manera innovadora para comunicarse a través del Internet, convirtiendo tu computadora en una línea de teléfono. Con **PhoneMAX**, no sólo puedes hacer llamadas ilimitadas a cualquier número de teléfono residencial, celular u otras computadoras, sino que también puedes ver a la persona con la que hablas y ella te puede ver a ti. <sup>1</sup> Sí, eso que imaginábamos que podríamos hacer en el futuro lejano, **¡ya es posible!**

Esta avanzada tecnología no es sólo posible, sino que es muy accesible y conveniente. El plan **PhoneMAX Unlimited** te permite hacer llamadas ilimitadas en Puerto Rico y de larga distancia a EE.UU. por un precio fijo mensual. Además, puedes utilizar tu número de teléfono **PhoneMAX** desde cualquier computadora con conexión de banda ancha en el mundo sin cargos de larga distancia adicionales.

**¿Cómo funciona?**

PhoneMAX utiliza la tecnología conocida como Voz sobre Protocolo de Internet (VoIP, por sus siglas en inglés). VoIP te permite hacer llamadas utilizando una línea de datos de banda ancha en vez de la línea tradicional de voz. Esto significa que estás utilizando la línea de acceso a **DMAX** para hacer tus llamadas de voz. La tecnología VoIP convierte tu voz en una señal de datos para que así pueda viajar rápidamente por el Internet y luego la vuelve a convertir en una señal de voz para que así te pueda escuchar cualquier persona en otra computadora, celular o teléfono de línea.

> **¡Solicítalo AHORA!**

(1) Requiere cámara de video ("webcam") adicional.

**Términos y condiciones**

Mapa del Sitio | [www.telefonicapr.com](http://www.telefonicapr.com) | [www.coqui.net](http://www.coqui.net)  
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Address [http://www.dmaxpr.com/phonemax\\_911.htm](http://www.dmaxpr.com/phonemax_911.htm) Go Links

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> ¿Qué es PhoneMAX?  
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> Planes  
> PhoneMAX y el 911

De ahora en adelante,  
tu manera de  
hacer llamadas será  
totalmente distinta.

**> PhoneMAX - 911**

Si estás inscrito a PhoneMAX y vas a usar el servicio en un lugar diferente a la dirección en tu factura de PRT, debes actualizar la información de tu cuenta antes de re-ubicar tu teléfono PhoneMAX. Esta información es necesaria para el registro del servicio de emergencia de 911.

Aquí puedes actualizar tu dirección para que, en caso de una emergencia, el personal del servicio de emergencias de 911 pueda identificar dónde estás ubicado usando la dirección que proveas.

**Actualizar dirección en Estados Unidos o Puerto Rico: [ACTUALIZA AQUI](#)**

**Otras áreas:** El servicio de 911 solo está disponible en EE.UU. y P.R.

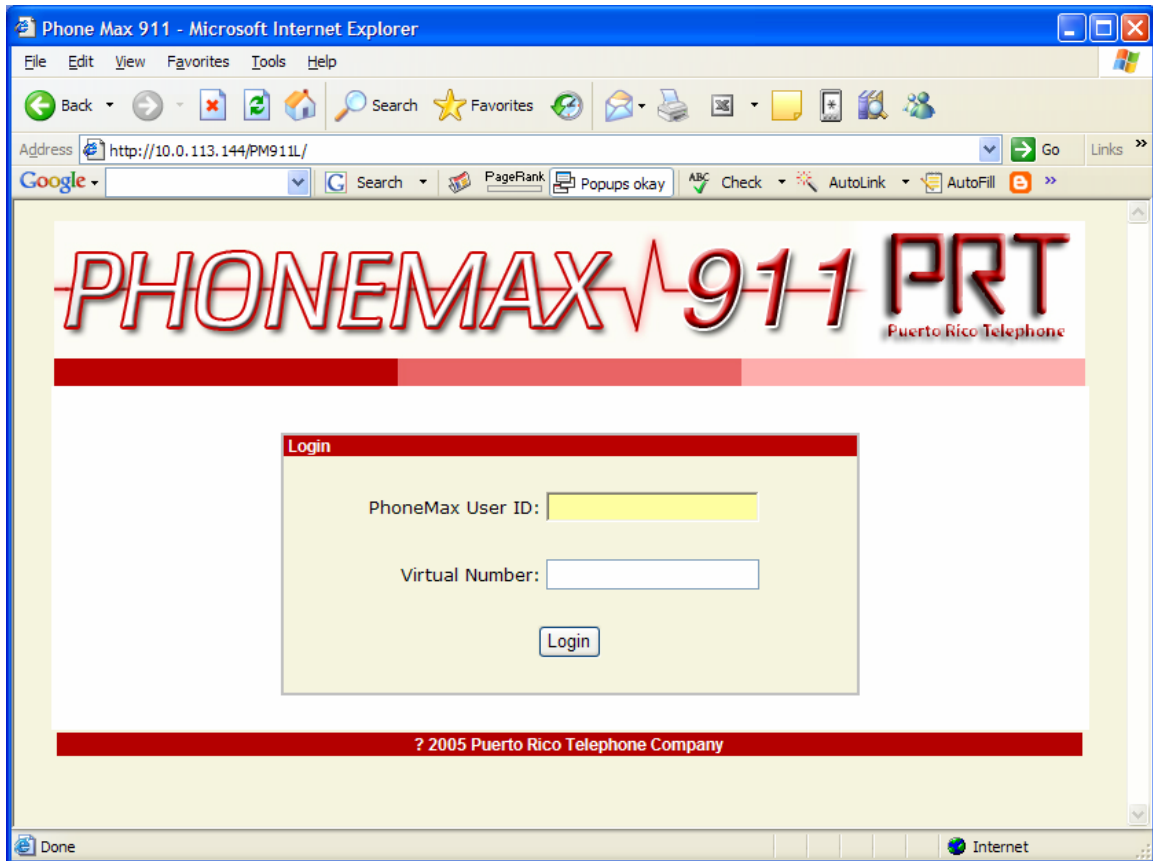
**Términos y condiciones**

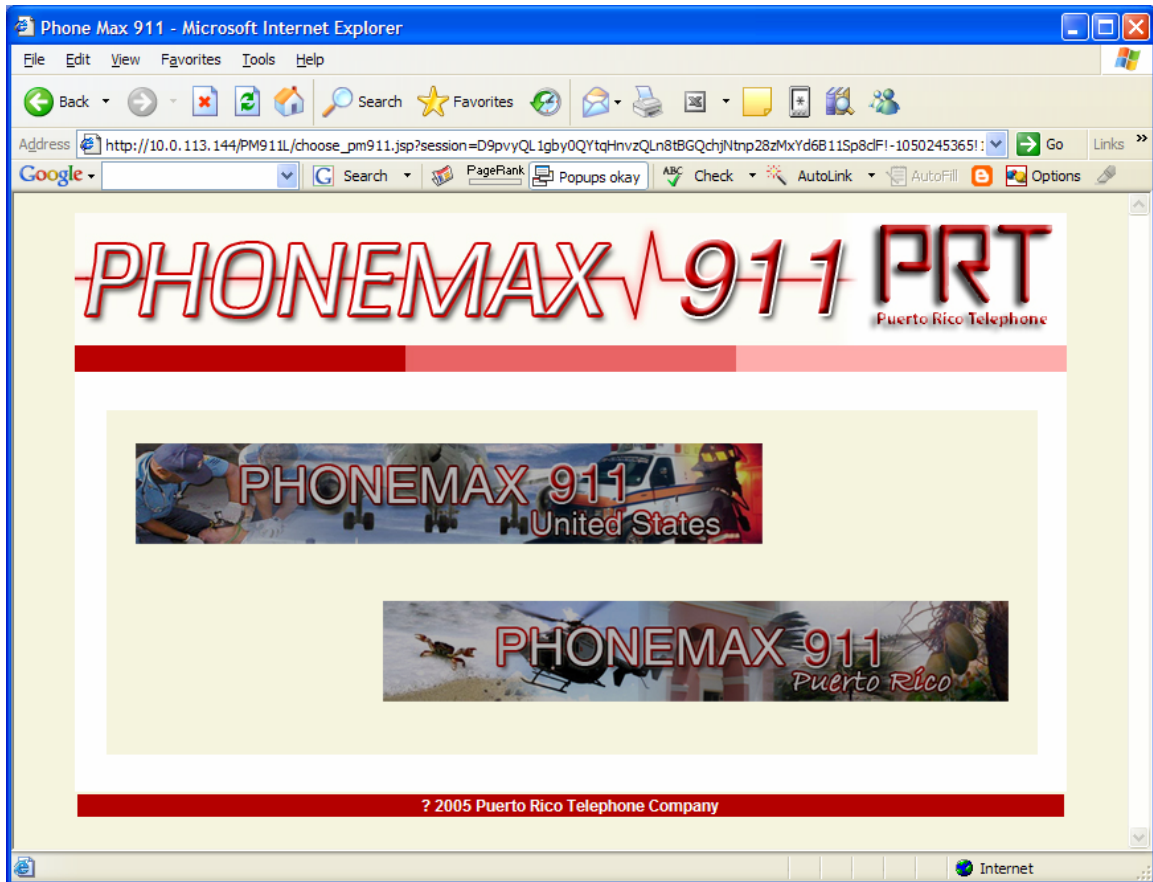
[Location Update Link](#)

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**Puerto Rico Telephone**



# PHONEMAX 911

*Puerto Rico*

[Current Location](#) | [Location History](#) | [Main Menu](#) | [Logout](#)

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Client Information

|                                      |                                  |   |
|--------------------------------------|----------------------------------|---|
| <b>Username:</b> luis@phonemaxpr.com | <b>Full Name:</b> Luis Rodriguez | <b>Account Number:</b> 7875247603         |
| <b>Service Type:</b> VOIP Generic    | <b>Home Phone:</b> 7875247603    | <b>E-mail:</b> lrodri26@prtcmail.prtc.net |

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Location Information

|  |  |   |
|--|--|---|
| <b>House Prefix: *</b> <input type="text"/>        | <b>House Number: *</b> <input type="text"/>                  | <b>Street Type:</b> <input type="text" value="Select"/>                                   |
| <b>Street Name: *</b> <input type="text"/>         | <b>Community: *</b> <input type="text"/>                     | <b>LOC: *</b> <input type="text"/>  |
| <b>Sub Location 1:</b> <input type="text"/>        | <b>Sub Location 2:</b> <input type="text"/>                  | <b>Sub Location 3:</b> <input type="text"/>   |
| <b>City: *</b> <input type="text" value="Select"/> | <b>State:</b> <input type="text" value="PR"/>                | <b>Zip Code: *</b> <input type="text" value="00000"/> - <input type="text" value="0000"/> |
| <b>Prominent Place:</b> <input type="text"/>       | <b>Street Direction:</b> <input type="text" value="Select"/> | <b>House Fraction:</b> <input type="text"/>   |

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